

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR LIMITED
DISCOVERY**

Fed. R. Civ. P. 26(d)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiffs moved the Court for an order directing defendant Facebook, Inc. (“Defendant” or “Facebook”) to produce limited categories of documents and information.

After consideration of the briefs and arguments of counsel, the Court GRANTS Plaintiffs’ motion and HEREBY ORDERS that Facebook is ordered to produce the following categories of documents and information to Co-Lead Counsel for Plaintiffs by August 31, 2018:

1. Information sufficient to identify all apps, app developers, and other third parties, in addition to Cambridge Analytica, that Facebook has identified as having accessed or obtained the Personal Data¹ of Facebook users.
2. Copies of any agreements between Facebook and each of the apps, app developers, and other third parties identified in Category 1, relating to the access, use, transmission, receipt, collection or analysis of Facebook users’ personal data and a statement of revenues received by Facebook, by quarter, arising out of each such agreement, from 2009 forward.
3. For each of the apps, app developers, and other third parties identified in Category 1, a written description of each type of Personal Data, described categorically, that Facebook has identified as having been accessed or obtained.
4. For each of the apps, app developers, and other third parties identified in Category 1, information sufficient to identify how each app, app developer, and any other third parties accessed or obtained the Personal Data of Facebook users.
5. For each of the apps, app developers, and other third parties identified in Category 1, information sufficient to identify how each app, app developer, and any other third party used the Personal Data it accessed or obtained.

¹ For purposes of this Order, Personal Data refers to information about an individual that can be used to distinguish or trace an individual's identity, such as name, race, gender, orientation, education, compensation, social security number, date and place of birth, mother's maiden name, and biometric records, as well as information linked to that individual, including activities such as likes, shares, associations, relationships and status, as well as political, religious, financial data or emotions relating to receipt of news or advertisements.

6. A copy of each version of each form of communication that in or since March 2018 has been transmitted to Facebook users relating to whether Facebook users' personal data was accessed or obtained by apps, app developers, and other third parties.
7. Reproductions of all documents provided to federal and state regulators in the United States, and regulators in the United Kingdom, in response to inquiries and investigations of the conduct alleged in the underlying complaints.

IT IS SO ORDERED.

Dated: _____

HON. VINCE CHHABRIA
United States District Judge